

JEANNETTE M. AMODEO, ESQUIRE
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JA 7372

UNITED STATES BANKRUPTCY COURT FOR
THE CAMDEN DISTRICT OF NEW JERSEY

IN RE: Denise Mahoney

: BANKRUPTCY NO.: 06-10812-GMB

DEBTOR

: CHAPTER 13

: CERTIFICATION IN OPPOSITION TO
: MOTION FOR ORDER DIRECTING PAYMENT
: OF FUNDS TO BANK OF AMERICA
: CORPORATION PURSUANT TO 11 U.S.C.
: SECTION 347 AND 28 U.S.C. SECTION 2041
: *ET. SEQ*

: HEARING DATE: June 20, 2011 at 10:00 a.m.

I, Jeannette M. Amodeo, Esquire, hereby certify as follows:

1. I am an attorney at law licensed to practice in the State of New Jersey, and have been retained by the Debtor in this matter. I am thoroughly familiar with the facts alleged in this Certification and am authorized to make this Certification on behalf of the Debtor.
2. Debtor filed for protection under 11 U.S.C. Chapter 13 on February 7, 2006.
3. Debtor's Plan proposed to pay the arrearage claim of Countrywide Mortgage and said Plan was Confirmed.
4. Countrywide Mortgage received and cashed payments through the payment disbursed January 7, 2010.
5. Countrywide Mortgage obtained prospective relief from the automatic stay on December 11, 2009.
6. No payments were accepted by Countrywide Mortgage after January 17, 2010.
7. Thereafter, Debtor pursued a loan modification. The funds Debtor continued to pay to the Trustee were a good faith part of said request.
8. The loan modification was denied. At least two requests were submitted.
9. No further payments are due under Debtor's Plan. Debtor's Plan reached sixty (60) months in February 2011. Therefore, at a minimum, the March and April payments

10. I contacted the Trustee on May 3, 2011 about the turnover of funds and was preparing a motion to do same.
11. The funds in question should be turned over to the Debtor and Debtor should receive her discharge.
12. This Certification is made in Opposition to Motion for Order Directing Payment of Funds to Bank of America Corporation Pursuant to 11 U.S.C. Section 347 and 28 U.S.C. Section 2014 *Et. Seq.*

I hereby certify that all of the above statements are true and correct to the best of my information, knowledge and belief. I understand that if any of the foregoing statements are found to be willfully false, I am subject to punishment.

DATED: May 31, 2011

BY: /s/ Jeannette M. Amodeo
JEANNETTE M. AMODEO, ESQUIRE.
Attorney for Debtor